

MELINDA HAAG (CABN 132612)
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division

KATHRYN R. HAUN (DCBN 484131)
Assistant United States Attorney

450 Golden Gate Avenue
San Francisco, California 94102
Telephone: (415) 436-7200
Facsimile: (415) 436-7234
email: kathryn.haun@usdoj.gov

Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

v.

JONATHAN MOTA,

Defendant.

No. CR 13-cr 93 JST

JOINT STIPULATION REGARDING
PROVISION OF DISCOVERY AND
~~PROPOSED~~ PROTECTIVE ORDER

The United States, through its counsel of record ("the Government"), and defendant Jonathan Mota, by and through his counsel of record, hereby agree and stipulate that the Government has and will continue to provide discovery on the following conditions set forth below. The reason for this stipulation is that some of the discovery in this case contains sensitive information, to include for example third party telephone information and bank account information of witnesses or associated parties. Documents containing any telephone number, social security number/taxpayer identification number, or financial account numbers, or date of birth or home address, or names of minor children of any person that are produced in this matter are deemed Protected Material. Possession of copies of the Protected Material is limited to the defendant, his attorney of record, and investigators, paralegals, law clerks, translators,

FILED

AUG 21 2013

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 interpreters, experts and assistants for the attorneys of record (hereinafter collectively referred to
2 as "members of the defense team").

3 The defendant, his attorney of record, and members of the defense team acknowledge that
4 providing copies of the Protected Material to other persons is prohibited, and agree not to
5 duplicate or provide copies of the Protected Material to other persons. The defendant, his
6 attorney of record, and members of the defense team may show Protected Material to witnesses
7 or prospective witnesses in conjunction with their defense of the defendant in this case. The
8 defendant, his attorneys of record, and members of the defense team further acknowledge that
9 they are prohibited from using the Protected Material for any purpose other than defending the
10 defendants in the above-captioned matter. Any violation of these prohibitions constitutes a
11 violation of the Protective Order. Further, the attorneys of record agree that prior to
12 disseminating any copies of the Protected Material to members of the defense team, they will
13 provide a copy of this Protective Order to members of the defense team.

14 The parties acknowledge their redaction responsibilities before the public filing of any
15 documents and, in compliance with Fed. R. Crim. P. 49.1, each signatory agrees to redact social
16 Security or taxpayer-identification numbers, financial account numbers, dates of birth, names of
17 minor children and home addresses.

18 SO STIPULATED.

19 DATED: August 6, 2013

20 /s/
KATHRYN R. HAUN
Assistant United States Attorney

21 /s/
RICHARD MAZER
Attorney for Jonathan Mota

22 **~~PROPOSED~~ ORDER**

23 The Court finds appropriate the parties' stipulation with respect to the provision of discovery in
24 this case. Accordingly, it is hereby ORDERED that discovery will be produced and handled in
25 accordance with the terms outlined in the "Joint Stipulation Regarding Provision of Discovery."
26

27 IT IS SO ORDERED.

28 DATED: 8/21/13


HON. JON S. TIGAR
United States District Judge